

present application was filed prior February 20, 2002, although Carlin is prior art for certain subject matter, it is not prior art for the relevant subject matter. Thus, Applicant respectfully requests reconsideration and withdrawal of all rejections relying upon subject matter added by the 2002 filing of Carlin.

In any event, even if Carlin were proper prior art under § 102, the disclosure thereof fails to teach or suggest elements of the present claims. For example, the present claims make a distinction between *component* and *composite* products, where *component* products are the parts used to assemble or create the *composite* products. As discussed in the present specification, the invention of the present claims provides for receiving orders for *component* products from producers, which *component* products can be assembled to form the *composite* products by such producers. In contrast, Carlin only discusses and relates to placing orders for completed products (i.e., *composite* products) and neither discusses nor contemplates any ordering for the parts (i.e., *component* products) which can be assembled by users into the completed products.

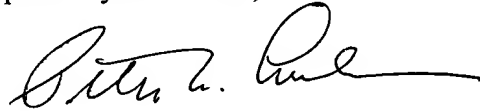
The present claims additionally recite that the software is distributed to producers. However, not only is the software of Carlin not distributed to the users, such users are not *producers*. The process of Carlin is described as being performed on-line, such as with a web browser or Web3D.. As such, users make selections, and “the specified scene parameters are sent to a server computer . . . such that the desired custom scene is rendered with photorealistic fidelity, and then returned to the client computer for display” (See, e.g., abstract and Paragraph [0055]) Thus, inasmuch as the processing is done *remotely* by software located on the “server computer,” the users merely interact with the software of Carlin, which software is not distributed to users.

Moreover, the system of Carlin is intended to be used by interior designers, furniture sale associates, advertising designers (abstract), and prospective purchasers (Paragraph [0056]). In contrast, the presently claimed invention is to be use by producers, i.e., entities which fabricate the *composite* product, described in the context of a cabinet maker in the specification. This difference further distinguishes the presently claimed process from the system of Carlin. As described throughout Carlin, the system of Carlin is used to arrange furniture and other objects in a room, and order such furniture and other objects. The system of Carlin provides for the

ordering of the furniture and other objects. In contrast, the method of the present claims allows a producer to design a product, and order the *component* parts of the product, with software furnished to the producer. The *component* products are then ordered and delivered to the producer, who assembles the *component* products into the *composite* product. Thus, as no cited reference teaches or suggests to modify the system of Carlin to permit ordering of *component* products by *producers*, rather than the interior designers, furniture sale associates, advertising designers, and prospective purchasers of Carlin, Applicant respectfully submits that Carlin (either alone or in combination with the alleged “well known facts” and the “Official Notice”) fails to teach or suggest each feature recited by the present claims.

Applicant respectfully requests withdrawal of the pending rejections and passage of this application to allowance. If any additional fee is necessary to make this paper timely and/or complete, it may be deducted from the undersigned’s Deposit Account No. 19-4375.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Peter N. Lalos", written in a cursive style.

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